# UNITED STATES BANKRUPTCY COURT DISTRICT OF NORTH DAKOTA

In re:

Jointly Administered

EPIC Companies Midwest, LLC,

EPIC Companies Midwest 2023, LLC,

EPIC Employee, LLC,

EPIC Employee, LLC,

EOLA Capital, LLC, and

EC West Fargo, LLC,

Bankruptcy No. 24-30284

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Debtors.<sup>1</sup> Chapter 11

# STATUS REPORT REGARDING LIGHTHOUSE MANAGEMENT GROUP, INC.'S FIRST THROUGH FIFTH OMNIBUS OBJECTIONS TO CLAIMS, AS LIQUIDATING TRUSTEE OF THE EPIC LIQUIDATING TRUST

- 1. Lighthouse Management Group, Inc. (the "Liquidating Trustee"), as trustee of the EPIC Liquidating Trust (the "Liquidating Trust"), on behalf of EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the "Debtors"), filed five omnibus objections to claims (collectively, the "Claims Objections," and individually, "First Claim Objection" (ECF No. 500), "Second Claim Objection" (ECF No. 501), "Third Claim Objection" (ECF No. 502), "Fourth Claim Objection" (ECF No. 503), and "Fifth Claim Objection" (ECF No. 504)).
- 2. The deadline to file responses to the Claim Objections was yesterday, January 26, 2026. (ECF Nos. 505–09.)

<sup>&</sup>lt;sup>1</sup> In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Debtors' address is c/o Lighthouse Management Group, Inc., 900 Long Lake Road, Suite 180, New Brighton, MN 55112 and their Employer Identification Numbers (EINs) are as follows: 83-2840705 (EPIC Companies Midwest, LLC), 88-3709518 (EPIC Companies Midwest 2023, LLC), 88-4112082 (EPIC Employee, LLC), 88-0554720 (EOLA Capital, LLC) and 82-5331354 (EC West Fargo, LLC).

#### I. INFORMAL RESPONSES.

- 3. The Liquidating Trustee received informal responses or inquiries to the Claim Objections from the following entities or individuals: (a) Rent Group, Inc. (Second Claim Objection (No Liability), ECF No. 501); (b) Wayne Ganskop (Fourth Claim Objection (Incorrect Amounts), ECF No. 503); (c) Dwight Schmidt (Fifth Claim Objection (Incorrect Claimant), ECF No. 504); (d) Troy Moore (Fourth Claim Objection (Incorrect Amounts), ECF No. 503; (e) Michael and Jill Thompson (Fifth Claim Objection (Incorrect Claimant), ECF No. 504); (d) Darlene Pich (Firsts and Fourth Claim Objection (Duplicate Claims and Incorrect Amounts), ECF Nos. 500, 503); (e) AMEX TRS Co., Inc. (Second Claim Objection (No Liability), ECF No. 501); and (f) Essential Living, Inc. (Third Claim Objection (Insider Claims), ECF No. 502).
- 4. Based on the Liquidating Trustee's discussions with Essential Living, Inc., the Liquidating Trustee has agreed to withdraw the objection to Essential Living, Inc.'s claim.
- 5. Further, based on discussions with the other entities or individuals, the Liquidating Trustee believes that their questions or concerns have been resolved, except for AMEX TRS Co., Inc. The Liquidating Trustee continues to have productive discussions with AMEX TRS Co., Inc. and agreed to provide an extension of the time for AMEX TRS Co., Inc. to file a formal response to the Second Claim Objection while discussions are ongoing.

#### II. FORMAL RESPONSES.

6. The Liquidating Trustee received formal responses to the Claim Objections from the following entities or individuals: (a) Jim Johnson (Fifth Claim Objection (Incorrect Claimant), ECF No. 504; Response, ECF No. 520); (b) Todd and Cindy Brown (Fifth Claim Objection (Incorrect Claimant), ECF No. 504; Response, ECF No. 522); (c) Myron Schapp (Fourth Claim Objection (Incorrect Amounts), ECF No. 503; Response, ECF No. 525); (d) Tyler John Bay (Second Claim Objection (No Liability Claims), ECF No. 501; Response, ECF No. 528); and (e)

7 Mile Holdings, LLC (Third Claim Objection (Insider Claims), ECF No. 502, Response, ECF No. 529).

7. Based on the Liquidating Trustee's discussions with certain of these entities or individuals, the Liquidating Trustee believes that the formal responses have been resolved, except for 7 Mile Holdings, LLC. The Liquidating Trustee has not yet had discussions with 7 Mile Holdings, LLC.

#### III. PROPOSED NEXT STEPS.

- 8. Based on the foregoing, the Liquidating Trustee believes that orders can be entered granting the First Claim Objection (ECF No. 500), the Second Claim Objection (with AMEX TRS Co., Inc. removed) (ECF No. 501), the Third Claim Objection (with Essential Living, Inc. and 7 Mile Holdings, LLC removed) (ECF No. 502), the Fourth Claim Objection (ECF No. 503), and the Fifth Claim Objection (ECF No. 504), pending a hearing.
- 9. The Liquidating Trustee further believes that it is in the best interest of the Liquidating Trust and the most effective and efficient use of trust resources to treat the hearing on Tuesday, February 3, 2026 at 10:30 a.m. as a status hearing. (ECF Nos. 505–09.) That would allow the Liquidating Trustee additional time to have discussions with AMEX TRS Co., Inc. and 7 Mile Holdings, LLC and to select a continued hearing date for an evidentiary hearing on the Claim Objections, to the extent one is needed.
- 10. The Liquidating Trustee expects to mail, e-mail, or e-serve a copy this *Status Report* to the above-mentioned interested parties.
- 11. The Liquidating Trustee also anticipates filing a *Motion to Appear by Video Conference or Telephone* in conjunction with this *Status Report*.

Dated: January 27, 2026

#### /s/ Steven R. Kinsella

Michael S. Raum (#05676)

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## ATTORNEYS FOR LIQUIDATING TRUSTEE

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## **AFFIDAVIT**

I, Patrick Finn, am a Partner at Lighthouse Management Group, Inc., the Liquidating Trustee of the EPIC Liquidating Trust, and I declare under penalty of perjury that the facts set forth in the preceding status report are true and correct, according to the best of my knowledge, information, and belief.

Dated: January 27, 2026 /s/ Patrick Finn

Patrick Finn
Partner, Lighthouse Management Group, Inc.
Liquidating Trustee of the EPIC Liquidating Trust